

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

**Cung Le, Nathan Quarry, Jon Fitch,
Brandon Vera, Luis Javier Vazquez, and
Kyle Kingsbury, on behalf of themselves and
all others similarly situated,**

Plaintiffs,

v.

**Zuffa, LLC, d/b/a Ultimate Fighting
Championship and UFC,**

Defendant.

Case No.: 2:15-cv-01045-RFB-BNW

**DECLARATION OF RICHARD A.
KOFFMAN, ESQ., IN SUPPORT OF
PLAINTIFFS' MOTION TO PROHIBIT
IMPROPER SOLICITATION OF CLASS
MEMBERS AND TO REMEDY PAST
IMPROPER SOLICITATIONS**

I, Richard A. Koffman, Esq., declare and state as follows:

1. I am a Partner in the law firm of Cohen Milstein Sellers & Toll, PLLC, one of the Court-appointed Interim Co-Lead Counsel for the certified Bout Class. I am a member in good standing of the District of Columbia Bar and have been admitted *pro hac vice* in this Court. I am over 18 years of age and have personal knowledge of the facts stated in this Declaration. If called as a witness, I could and would testify competently to them.
2. I make this Declaration in support of Plaintiffs' Motion to Prohibit Improper Solicitation of Class Members and to Remedy Past Improper Solicitations.
3. Attached as Exhibit 1 is a true and correct copy of e-mails dated Aug. 22, 2023 and Aug. 29, 2023, from Class Counsel Joshua P. Davis to Eli Kay-Oliphant of Sparacino PLLC.

4. Attached as Exhibit 2 is a true and correct copy of a March 16, 2021 letter from Ryan R. Sparacino, Managing Partner of Sparacino PLLC, to Bout Class member Sean Sherk.

5. Attached as Exhibit 3 is a true and correct copy of a brochure that accompanied Mr. Sparacino's March 16, 2021 letter to Bout Class member Sean Sherk.

6. Attached as Exhibit 4 is a true and correct copy of a Declaration of Professor Jeffrey W. Stempel, dated September 26, 2023.

7. Attached as Exhibit 5 is a true and correct copy of a Supplemental Declaration of Professor Jeffrey W. Stempel, dated October 9, 2023.

8. Attached as Exhibit 6 is a true and correct copy of a March 24, 2021 letter from Ryan R. Sparacino, Managing Partner of Sparacino PLLC, to Bout Class member Sean Sherk.

9. Attached as Exhibit 7 is a true and correct copy of a Declaration of Antonio McKee, dated September 22, 2023.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed on this 24th day of October, 2023, in Rockville, MD.

/s/ Richard A. Koffman